

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL 2327
THIS DOCUMENT RELATES TO ALL CASES	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

**PLAINTIFF'S OBJECTIONS TO CROSS NOTICE OF VIDEO DEPOSITION OF RON
HORTON**

Plaintiffs object to Ethicon, Inc., and Johnson & Johnson's Cross Notice to Take Video Deposition of Ron Horton as follows:

1.

Plaintiffs object to the Cross Notice to Take Video Deposition of Ron Horton as it violates Federal Rule of Civil Procedure 30(b)(1), which requires reasonable notice to every other party. Plaintiffs received the Cross Notice less than 42 hours prior to the scheduled deposition, which is insufficient time for a representative from the MDL to prepare for and travel to the deposition location in Morristown, New Jersey.

2.

Plaintiffs object to the Cross Notice to Take Video Deposition of Ron Horton as it does not clearly state the deponent's name in violation of Federal Rule of Civil Procedure 30(b)(1). The caption of the cross notice states that the deponent is Ron Horton, while the main body of the cross notice states that the deponent is Michael Hulse, M.D. It is unclear to the Plaintiffs if the deponent is Ron Horton, Michael Hulse, M.D., or both.

This 30th day of June, 2015.

PLAINTIFFS' CO-LEAD COUNSEL

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